### Exhibits Explained.

### Channel 285C Milford, UT

Exhibit E, Figure 1 is an allocation study showing the spacings to other stations if channel 285C is allocated Milford, UT, as that community's first local aural service. The only short spacing shown is KNJQ, channel 286C in Manti, UT. Exhibit E, Figure 2 shows the proposed city-grade contour for channel 285C from the proposed site. The city-grade contour easily covers 100% of Milford, UT. Exhibit E, Figure 3 is a gain study that demonstrates the proposed areas that channel 286C will cover as a result of the proposed allocation. It should be noted that first aural service shall be provided to 270 persons as a result of this allocation as white area will be eliminated to a substantial region of west-central Utah.

# Channel 286C American Fork, UT

Exhibit E, Figure 4 is an allocation study showing the spacings to other stations if channel 286C is reallocated from Manti, UT, to American Fork, UT, as that community's first local aural service. The only short spacing shown is KXRV, channel 289C in Centerville, UT. Exhibit E, Figure 5 shows the proposed city-grade contour for channel 286C from the proposed site. The city-grade contour easily covers 100% of American Fork, UT. Exhibit E, Figure 6 is a gain/loss study that demonstrates the proposed areas that channel 286C will cover and 286C will no longer cover as a result of the proposed relocation. Exhibit E, Figure 7 is a remaining services study showing that only a minute amount of grey area will be created as a result of the relocation however no persons live in the grey area being created.

### Channel 290C Centerville, UT

In order to allocate channel 286C at American Fork, the short spacing with channel 289C (KXRV) in Centerville, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 290C for channel 289C at Centerville with no site change needed. Exhibit E, Figure 8 is an allocation study showing the proposed short spacing four facilities: KBMG channel 291C Evanston, WY; KOSY-FM channel 293C in Spanish Fork, UT; the vacant allotment site for channel 290C1 at Thayne, WY; and KLCY-FM channel 290A in Vernal, UT. Since the channel change is occurring at the currently licensed site and there is no change in class, no community coverage exhibit is included.

#### Channel 292C Evanston, WY

In order to allocate channel 288C at Oakley and channel 290C at Centerville, the short spacing with channel 291C (KBMG) in Evanston, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 292C for channel 291C at Evanston with no site change needed. Exhibit E, Figure 9 is an allocation study showing the proposed short spacing two facilities: KOSY 293C in Spanish Fork, UT; and the vacant allotment site for channel 293C at Superior, WY. Since the channel change is occurring at the currently licensed site and there is no change in class, no community coverage exhibit is included.

# Channel 294C Spanish Fork, UT

In order to allocate channel 292C at Evanston and channel 290C at Centerville, the short spacing with channel 293C (KOSY-FM) in Spanish Fork, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 294C for channel 293C at Spanish Fork with no site change needed. Exhibit E, Figure 10 is an allocation study showing the proposed short spacing one facility: KRAR 295C in Brigham City, UT. Note, since the proposal requests a channel change of equivalent class (Class C) at the licensed KOSY-FM site, a contour map demonstrating community coverage is not required.

# Channel 296C Woodruff, UT

In order to allocate channel 294C at Spanish Fork, the short spacing with the licensed site for channel 295C KRAR Brigham City, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 295C at Brigham City and add channel 296C at Woodruff, UT, for use by KRAR with a site modification. Exhibit E, Figure 11 is an allocation study showing the proposed short spacing two facilities: KAOX 297C1 Kemmerer, WY, and the CP site for 296C2 Huntington, Utah. . Exhibit E, Figure 12 shows the proposed city-grade contour for channel 296C from the proposed site. The city-grade contour easily covers 100% of Woodruff, UT Exhibit E, Figure 13 is a gain/loss study that demonstrates the proposed areas that channel 296C will cover and 295C will no longer cover as a result of the proposed relocation. Exhibit E, Figure 14 is a remaining services study showing the services that will continue to serve the loss area after channel 295C is deleted from Brigham City. It should be noted that the deletion of 295C from Brigham City will result in that community still retaining at least one local aural service: KXOL (AM) 1660 kHz.

### Channel 297C1 Shelley, Idaho

In order to allocate channel 296C at Woodruff, UT, the short spacing with channel 297C1 (KAOX) in Kemmerer, WY, must be eliminated. In order to eliminate this short spacing, it is proposed to delete channel 297C1 at Kemmerer and allocate channel 297C1 at Shelley, Idaho. Exhibit E, Figure 15 is an allocation study showing the proposed short spacing one facility: KQEO 296C1 Idaho Falls. Exhibit E, Figure 16 shows the proposed city-grade contour for channel 297C1 from the proposed site. The city-grade contour easily covers 100% of Shelley, ID, with line of sight to the entire community. Exhibit E, Figure 17 is a gain/loss study that demonstrates the proposed areas that channel 297C1 will cover and 297C1 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 18 is a remaining services study showing the services that will continue to serve the loss area after channel 297C1 is deleted from Kemmerer. It should be noted that no white area will be created since, in this proposal, KCUA channel 223C1 will be allotted at Diamondville, WY, and replace service in areas that would otherwise become unserved as a result of the relocation of KAOX. No grey area is being created as a result of this relocation.

# Channel 300C1 Idaho Falls, ID

In order to allocate channel 297C1 at Shelley, the short spacing with channel 296C1 (KQEO) in Idaho Falls, ID, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 300C1 for channel 296C1 at Idaho Falls at a modified site. Exhibit E, Figure 19 is an allocation study showing the proposed short spacing no other facilities. Exhibit E, Figure 20 shows the proposed city-grade contour for channel 300C1 from the proposed site. The city-grade contour easily covers 100% of Idaho Falls, ID, with line of sight to the entire community. Exhibit E, Figure 21 is a gain/loss study that demonstrates the proposed areas that channel 300C1 will cover and 296C1 will no longer cover as a result of the proposed relocation.

### Channel 297C2 Huntington, UT

In order to allocate channel 296C at Woodruff, the short spacing with the Permitted Site for channel 296C2 at Huntington, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 297C2 for channel 296C2 at Huntington at a new site. Exhibit E, Figure 22 is an allocation study showing the proposed change at the Permitted Site short spacing one facility: KENZ 298C Orem, UT. Exhibit E, Figure 23 shows the proposed city-grade contour for channel 300C1 from the proposed site. The city-grade contour easily covers 100% of Huntington, UT, with line of

sight to the entire community. Exhibit E, Figure 24 is a gain/loss study that demonstrates the proposed areas that channel 297C2 will cover and 296C2 will no longer cover as a result of the proposed relocation.

# Channel 298C Kaysville, UT

In order to allocate channel 297C2 at Huntington, the short spacing with channel 298C (KENZ) in Orem, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 298C at Orem and allocate channel 298C at Kaysville, UT, as that community's first local aural service. Exhibit E, Figure 25 is an allocation study showing the proposed short spacing one new facility: KUDD channel 300C in Roy, UT. Note, the proposed changes previously offered herein for KAOX channel 297C1 Kemmerer, WY (moving to Shelley, ID, on 297C1) have eliminated the apparent conflict. Exhibit E, Figure 26 shows the proposed city-grade contour for channel 298C from the proposed site. The city-grade contour easily covers 100% of Kaysville, UT. Exhibit E, Figure 27 is a gain/loss study that demonstrates the proposed areas that channel 298C will cover and no longer cover as a result of the proposed relocation. Exhibit E, Figure 28 is a remaining services study showing the services that will continue to serve the loss area after channel 298C is deleted from Orem. It should be noted that the deletion of 298C from Orem will result in that community still retaining one local aural service: KOHS (FM) 219A.

# Channel 300C Randolph, UT

In order to allocate channel 298C at American Fork, UT, the short spacing with channel 300C (KUDD) in Roy, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to delete channel 300C at Roy and allocate channel 300C at Randolph, UT, as that community's second local aural service. Exhibit E, Figure 29 is an allocation study showing the proposed short spacing no facilities. Exhibit E, Figure 30 shows the proposed city-grade contour for channel 300C from the proposed site. The city-grade contour easily covers 100% of Randolph, UT, with line of site to 100% of the community. Exhibit E, Figure 31 is a gain/loss study that demonstrates the proposed areas that channel 300C will cover and no longer cover as a result of the proposed relocation. Exhibit E, Figure 32 is a remaining services study showing that some grey area will be created after channel 300C is deleted from Roy. The population inside this grey area is 68 persons. It should be noted that the deletion of 300C from Roy will result in that community still retaining one local aural service: KANN (AM) 1120 kHz.

### Channel 298C Superior, WY

In order to allocate channel 292C at Evanston, the short spacing with the Original Allotment Site for 293C in Superior, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 298C for channel 293C at Superior at the Original Allotment Site. Note, channel 298C1 can also be substituted for channel 298C1 at the Permitted Site. Exhibit E, Figure 33 is an allocation study showing the proposed change at the Original Allotment Site short spacing one facility: KAOX 297C1 in Kemmerer, WY.

### Channel 286C1 Thayne, WY

In order to allocate channel 290C at Centerville, UT, the short spacing with the allotment site for KTYN on channel 290C1 at Thayne, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 286C1 for channel 290C1 at Thayne with a site modification. Note, channel 286C3 can also be substituted for channel 290C3 at the permitted site. Exhibit E, Figure 34 is an allocation study showing the proposed change at the Original Allotment Site short spacing two facilities: the vacant allotment of channel 286A at Dubois, ID, and KDWY 287C2 Diamondville, WY. Exhibit E, Figure 35 shows the proposed city-grade contour for channel 286C1 from the proposed site. The city-grade contour easily covers 100% of Thayne, WY, with line of site to 100% of the community. Exhibit E, Figure 36 is a gain/loss study that demonstrates the proposed areas that channel 286C1 will cover and 290C1 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 37 is an allocation study showing that channel 286C3 may also be allocated at the Class C3 Permitted Site without shortspacing any facilities.

### Channel 288C Oakley, UT

In order to allocate channel 286C1 at Thayne, the short spacing with channel 287C2 (KDWY) in Diamondville, WY, must be eliminated. In order to eliminate this short spacing, it is proposed to delete channel 287C2 at Diamondville and allocate channel 288C at Oakley, UT, as that community's second local aural service. Exhibit E, Figure 38 is an allocation study showing the proposed short spacing three facilities. All three facilities have been previously proposed herein to make channel changes which eliminate any conflict. KXRV 289C in Centerville, UT has been proposed to move to 290C. KLCY-FM channel 288C2 in Vernal, UT, has been proposed to change to 245C2. Finally, KBMG 291C in Evanston, WY, has been proposed to change to 292C. Exhibit E, Figure 39 shows the

proposed city-grade contour for channel 288C from the proposed site. The city-grade contour easily covers 100% of Oakley, UT. It should also be noted that the proposed site also serves as the licensed site of KEGA 268C Oakley, UT, on a master antenna owned by members of the Joint Parties. It is the Joint Parties' intention to combine KDWY onto the KEGA antenna and serve Oakley with equivalent Class C facilities as KEGA. Exhibit E, Figure 40 is a gain/loss study that demonstrates the proposed areas that channel 288C will cover and the areas 287C2 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 41 is a remaining services study showing the services that will continue to serve the loss area after channel 287C2 is deleted from Diamondville. It should be noted that the deletion of 287C2 from Diamondville will result in that community losing its only local aural service. Replacement shall be provided by KCUA on channel 223C1 and is discussed later in the exhibits.

# Channel 223C1 Diamondville, WY

In order to replace the loss of Diamondville's only local aural service, it is proposed that KCUA channel 223C3 Naples, UT, be deleted from Naples, UT, and be added at Diamondville, WY, on channel 223C1. Exhibit E, Figure 42 is an allocation study showing the proposed short spacing one facility: KUUU channel 223C2 in South Jordan, UT. Exhibit E, Figure 43 shows the proposed citygrade contour for channel 223C1 from the proposed site. The city-grade contour easily covers 100% of Diamondville, WY, with complete line of sight. Exhibit E, Figure 44 is a gain/loss study that demonstrates the proposed areas that channel 223C1 will cover and the areas 223C3 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 45 is a remaining services study showing the services that will continue to serve the loss area after channel 223C3 is deleted from Naples. It should be noted that the deletion of 223C3 from Naples will result in that community losing its only local aural service. Replacement service at Naples shall be provided by KIFX on channel 253C2 and shall be discussed in later exhibits.

#### Channel 223C2 South Jordan, UT

In order to allocate channel 223C1 at Diamondville, the short spacing with channel 223C2 (KUUU) in South Jordan, UT, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 223A for channel 223C2 at South Jordan and modify the site location. Exhibit E, Figure 46 is an allocation study showing the proposed short spacing no facilities. Exhibit E, Figure 47 shows the proposed city-grade contour for channel 223A from the proposed site. The city-grade contour easily covers 100% of South Jordan, UT. Exhibit E, Figure 48 is a gain/loss study that

demonstrates the proposed areas that channel 223A will cover and 223C2 will no longer cover as a result of the proposed relocation.

# Channel 255C2 Naples, UT

To replace the loss of Naples' only local aural service, it is proposed that KIFX channel 253C2 Roosevelt, UT, be deleted from Roosevelt, UT, and MX channel 255C2 be added at Naples, UT. Exhibit E, Figure 49 is an allocation study showing the proposed short spacing one facility: ALLO 255C3 Fruita, Colorado. Exhibit E, Figure 50 shows the proposed city-grade contour for channel 255C2 from the proposed site. The city-grade contour easily covers 100% of Naples, UT. Exhibit E, Figure 51 is a gain/loss study that demonstrates the proposed areas that channel 255C2 will cover and 253C2 will no longer cover as a result of the proposed relocation. Exhibit E, Figure 52 is a remaining services study showing the services that will continue to serve the loss area after channel 253C2 is deleted from Roosevelt. It should be noted that the deletion of 253C2 from Roosevelt will result in that community retaining two local aural services – KNEU (AM) 1250 kHz and KXRO (FM) 232C1.

# Channel 268C3 Fruita, CO

In order to allocate channel 255C2 at Naples, the short spacing with the Vacant Allotment on channel 255C3 at Fruita, CO, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 255A for channel 255C3 at Fruita and modify the site location. Exhibit E, Figure 53 is an allocation study showing the proposed short spacing no facilities. Exhibit E, Figure 54 shows the proposed city-grade contour for channel 255A from the proposed site. The city-grade contour easily covers 100% of Fruita, CO. Exhibit E, Figure 55 is a gain/loss study that demonstrates the proposed areas that channel 255A will cover and 255C3 will no longer cover as a result of the proposed relocation.

#### Channel 243A Dubois, ID

In order to allocate channel 286C1 at Thayne, the short spacing with Vacant Allotment 286A at Dubois must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 243A for channel 286A at Dubois at a new site. Exhibit E, Figure 56 is an allocation study showing the proposed change short spacing one facility: the permitted site for the new station to operate on 243C2 at Ashton, ID. Exhibit E, Figure 57 shows the proposed city-grade contour for channel 243A from the proposed site. The city-grade contour easily covers 100% of Dubois, ID. Exhibit E, Figure 58 is a

gain/loss study that demonstrates the proposed areas that channel 243A will cover and 286A will no longer cover as a result of the proposed relocation.

### Channel 259A Ashton, ID

In order to allocate channel 243A at Dubois, the short spacing with the permitted site for the new station on channel 243C2 at Ashton must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 259A for channel 243C2 at Ashton at the permitted site. Exhibit E, Figure 59 is an allocation study showing the proposed change short spacing one facility: the NPRM to add channel 259C at Meeteetse, WY. This is point at which the instant counter proposal becomes mutually exclusive with the petition for rulemaking in MB Docket 05-243. Exhibit E, Figure 60 shows the proposed city-grade contour for channel 259A from the proposed site. The city-grade contour easily covers 100% of Ashton, ID. Exhibit E, Figure 61 is a gain/loss study that demonstrates the proposed areas that channel 259A will cover and 243C2 will no longer cover as a result of the proposed relocation and downgrade.

# Channel 259C Meeteetse, WY

In order to allocate channel 259A at Ashton, the short spacing with the NPRM to add channel 259C at Meeteetse, WY, must be eliminated. In order to alleviate this short spacing, it is proposed to substitute channel 288C for 259C and move the allotment coordinates to a new site. Exhibit E, Figure 62 is an allocation study showing the proposed change short spacing no other facilities. Exhibit E, Figure 63 shows the proposed city-grade contour for channel 288C from the proposed site. The city-grade contour easily covers 100% of Meeteetse with complete line of sight. Exhibit E, Figure 64 is a gain/loss study that demonstrates the proposed areas that channel 288C will cover and 259C will no longer cover as a result of the proposed relocation and downgrade.

#### Channel 245C2 / 245A Vernal, UT

In order to allocate channel 288C at Oakley (KDWY) the short spacing with the permitted site for channel 288C2 (KLCY-FM) in Vernal, UT, must be eliminated. In order to allocate channel 290C at Centerville, the short spacing with the licensed site for channel 290A (KLCY-FM) in Vernal, UT, must be eliminated. In order to alleviate these short spacings, it is proposed to substitute channel 245C2 for channel 288C2 at the KLCY-FM permitted site and channel 245A for 290A at the KLCY-FM licensed site with no site change needed in either case. Exhibit E, Figure 65 is an allocation study showing the

245C2 at the Permitted Site short spacing no facilities. Exhibit E, Figure 66 is an allocation study showing the 245A at the Licensed Site short spacing no facilities. Since the channel change is occurring at the currently licensed/permitted site(s) and there is no change in class, no community coverage exhibit is included.

### **Conclusion**

The Joint Parties' counterproposal has demonstrated that it is in technical compliance with the present Commission Rules concerning such actions. The counterproposal produces new first aural service to 270 persons in west central Utah and east central Nevada and 6 persons in west central Wyoming. It also produces a new first local service to four communities (Kaysville, Utah, American Fork, Utah, Milford, Utah, and Meeteetse, WY), and a new second local service at three communities (Shelley, ID, Oakley, Utah, and Woodruff, UT). The counterproposal creates a net increase in new 60-dBu service of 59,406 square kilometers, and it provides a new 60 dBu service to 3,629,760 persons.

### Statement of the Consultants

The instant engineering portion of a counterproposal was prepared for the Joint Parties and supports a counterproposal to MM Docket 05-243. It was developed by Reynolds Technical Associates (RTA) and may not be used for purposes other than submission to the Commission by the Joint Parties. It may not be reproduced in its entirety, or in part, by anyone (other than from the Commission) without the written consent of RTA.

The information in this application is compiled from the most recent Commission and outside data. RTA is not responsible for errors resulting from incorrect data or unpublished rule and procedure changes.

For Reynolds Technical Associates:

Lee S. Reynolds September 19, 2005

12585 Old Highway 280 East, Suite 102 Chelsea, Alabama 35043 (205) 618-2020

### ENGINEERING STATEMENT

In Support of a Counterproposal MB Docket 05-243

# **Summary of Channel Assignments**

# (Depicting all communities, channels, and modifications)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Milford, UT		285C	Channel 285C will be added at Milford as that community's first local service (population 1,451). The addition of this channel will also provide first aural reception service to 280 persons.
American Fork, UT	***************************************	286C	Delete channel 286C at Manti, Utah and allocate channel 286C at American Fork, Utah, for use by KNJQ. The allocation of 286C1 will provide first local service to American Fork with a population of 21,941 according to the 2000 US Census
Manti, UT	286C, KMTI-AM	KMTI-AM	Channel 286C will be deleted at Manti and channel 286C allocated at American Fork. Manti will continue to receive service from KMTI-AM, 650 kHz.
Centerville, UT	289C	290C	Delete channel 289C at Centerville and allocate channel 290C at Centerville at the current site for KXRV.
Evanston, WY	252C2, 291C, KEVA- AM 1240 kHz	252C2, 292C, KEVA-AM 1240 kHz	Delete channel 291C at Evanston and allocate channel 292C at Evanston at the current site for KBMG.
Spanish Fork, UT	293C, KHQN-AM 1480 kHz	294C, KHQN- AM 1480 kHz	Delete channel 293C at Spanish Fork and allocate channel 294C at Spanish Fork at the current site for KOSY-FM.
Woodruff, UT	264C	264C, 296C	Delete channel 295C at Brigham City, Utah, and allocate channel 296C at Woodruff, Utah, for use by KRAR. The allocation of 296C will provide second local service to Woodruff with a population of 194 according to the 2000 US Census.
Brigham City, UT	295C, KXOL-AM 1660 kHz	KXOL-AM 1660 kHz	Channel 295C will be deleted at Brigham City and channel 296C allocated at Woodruff. Brigham City will continue to receive service from KXOL-AM, 1660 kHz.
Shelley, ID	292C1	292C1, 297C1	Delete channel 297C1 at Kemmerer, WY, and allocate channel 297C1 at Shelley, ID, for use by KAOX. The allocation of 297C1 will provide second local service to Shelley with a population of 3,813 according to the 2000 US Census.
Kemmerer, WY	297C1, KMER-AM 950 kHz	KMER-AM 950 kHz	Delete channel 297C1 at Kemmerer and allocate channel 297C1 at Shelley, ID. Kemmerer will continue to receive service from KMER 950 kHz.
Idaho Falls, ID	241C, 256C1, 277C1, 288C1, 296C1	241C, 256C1, 277C1, 288C1, 300C1	Delete channel 296C1 at Idaho Falls and allocate channel 300C1 at Idaho Falls at a new site for KQEO.
Huntington, UT	296C2 CP	297C2 CP	Delete channel 296C2 at Huntington and allocate channel 297C2 at Huntington a new site.
Kaysville, UT		298C	Delete channel 298C at Orem, Utah, and allocate channel 298C at Kaysville, Utah, for use by KENZ. The allocation of 298C will provide first local service to Kaysville with a population of 20,351 according to the 2000 US Census.
Orem, UT	219A, 298C	219A	Channel 298C will be deleted at Orem and channel 298C allocated at Kaysville. Orem will continue to receive service from KOHS (FM) 219A.



# Table 1 (continued)

COMMUNITY	PRESENT	PROPOSED	COMMENTS
Randolph, UT	272C	272C, 300C	Delete channel 300C at Roy, Utah, and allocate channel 300C at Randolph, Utah, for use by KUDD. The allocation of 300C will provide second local service to Randolph with a population of 483 according to the 2000 US Census.
Roy, UT	300C, KANN-AM 1090 kHz	KANN-AM 1090 kHz	Channel 300C will be deleted at Roy and channel 300C allocated at Randolph. Roy will continue to receive service from KANN (AM) 1120 kHz.
Superior, WY	293C (293 C1 CP)	298C (298C1 CP)	Delete channel 293C at Superior and allocate channel 298C at Superior at the Allotment Site (and/or delete channel 293C1 at Superior and allocate channel 298C1 at the Permitted Site for the new station).
Thayne, WY	290C1 (290C3 CP)	286C1 (286C3 CP)	Delete channel 290C1 at Thayne and allocate channel 286C1 at Thayne at the Allotment Site (and/or delete channel 290C3 at Thayne and allocate channel 286C3 at the Permitted Site for the new station).
Oakley, UT	268C	268C, 288C	Delete channel 287C2 at Diamondville and allocate channel 288C at Oakley for use by KDWY. The allocation of 288C will provide second local service to Oakley with a population of 948 according to the 2000 US Census.
Diamondville, WY	287C2	223C1	When KAOX exits Diamondville en route for Oakley, Diamondville will need replacement service. This shall be provided by KCUA which currently operates on 223C3 in Naples, UT. Channel 223C3 will be deleted at Naples and MX channel 223C1 will be allocated to Diamondville for use by KCUA.
South Jordan, UT	223C2	223A	Delete channel 223C2 at South Jordan and allocate channel 223A at South Jordan at a new site for use by KUUU.
Naples, UT	223C3	255C2	When KCUA exits Naples en route for Diamondville, Naples will need replacement service. This shall be provided by KIFX which currently operates on channel 253C2 at Roosevelt, UT. Channel 253C2 will be deleted at Roosevelt and MX channel 255C2 will be allocated to Naples for use by KIFX.
Roosevelt, UT	232C1, 253C2, KNEU-AM	232C1, KNEU- AM	Channel 253C2 will be deleted at Roosevelt and channel 255C2 allocated at Naples. Roosevelt will continue to receive service from KXRQ (FM) 232C1 and KNEU-AM, 1250 kHz.
Fruita, CO	255C3, 260C	260C, 255A	Delete vacant allotment channel 255C3 at Fruita and allocate channel 255A at Fruita at a new site.
Dubois, ID	286A	243A	Channel 286A will be deleted at Dubois and channel 243A will be allocated at Dubois at a new site.
Ashton, ID	243C2	259A	Channel 243C2 will be deleted at Ashton and channel 259A will be allocated at Ashton at a new site.
Meeteetse, WY	273C	288C	Errant Channel 273C will be deleted at Meeteetse and channel 288C will be allocated at Meeteetse at a new site.
Vernal, UT	290A (288C2 CP), KVEL-AM 920 kHz	245A (245C2 CP), KVEL-AM 920 kHz	Delete channel 290A at Vernal and allocate channel 245A at Vernal at the licensed site for KLCY-FM (and delete channel 288C2 at Vernal and allocate 245C2 at the KLCY-FM permitted site).



In Support of a

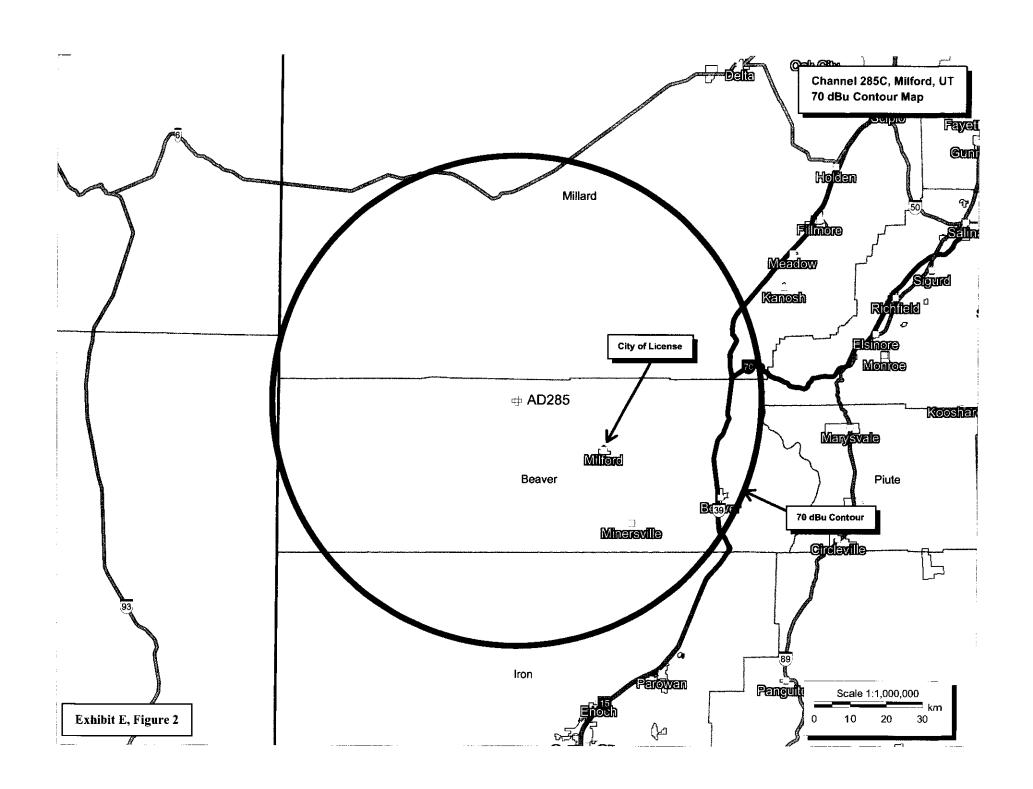
### Counterproposal

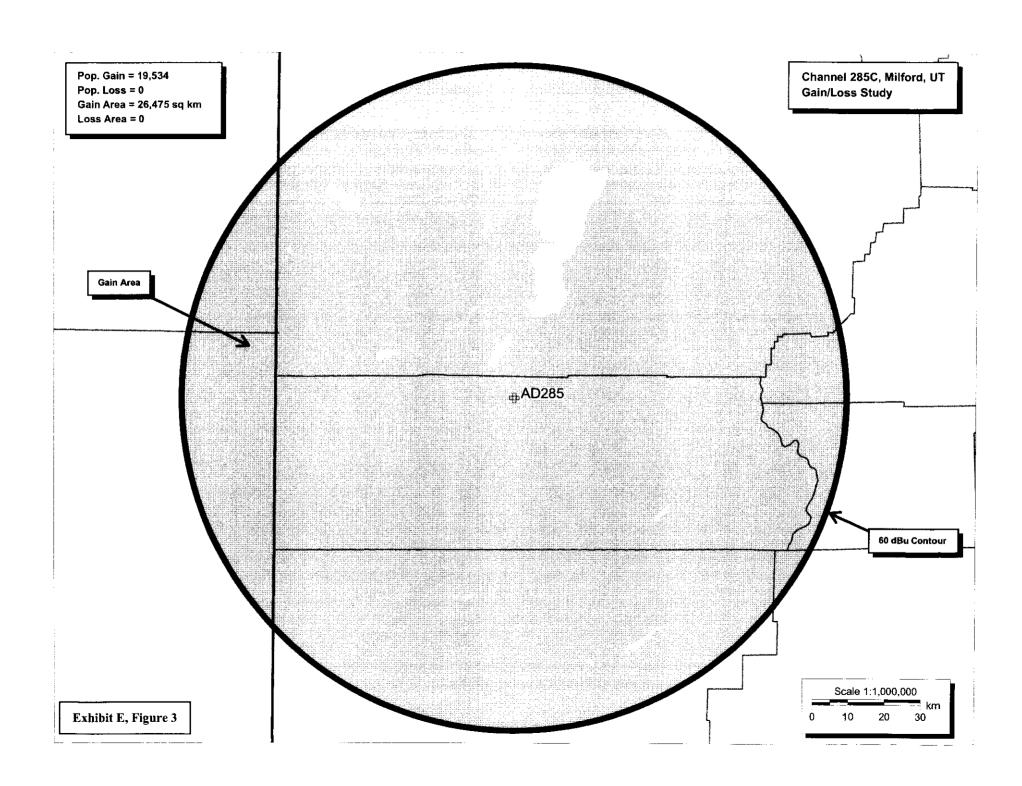
The Joint Parties

MB Docket 05-243, RM-FCC

Allocation Study - Ch 285C at Milford, UT (ADD 285C) Requiring one spectrum modification (Using ADD 285 allotment coordinates as reference)

REFEREN 38 31 1 113 17	1 N 07 W		CLA: Current Channel 28	SS = C Spa 5 - 10	cings 4.9 MHz -	I 5	DATES 9-16-05 9-18-05	
Call	Cha	nne1	Location					_
Nor	ence C th Lat	oordina itude:				119.58		
		285C	Milford	UT	0.00	0.0	290.0	-290.00
at re	ment p ferenc <b>DEL</b> LIC-N	e coord 286C 286C		e. <b>UT</b>	201.93	46.3 46.3		
Delet		Ch 286	C proposed in inst See KNJQ.P below.	cant				
Of No Allot	te: ment o	f Ch 28	American Fork  6C at American For Parties		255.16	21.0	241.0	14.16
KWLY	LIC	284C1	Moapa Valley	NV	230.87	208.3	209.0	21.87
RADD	ADD	287C2	Laverkin	UT	144.78	173.5	105.0	39.78
			Kaysville					





In Support of a

# Counterproposal

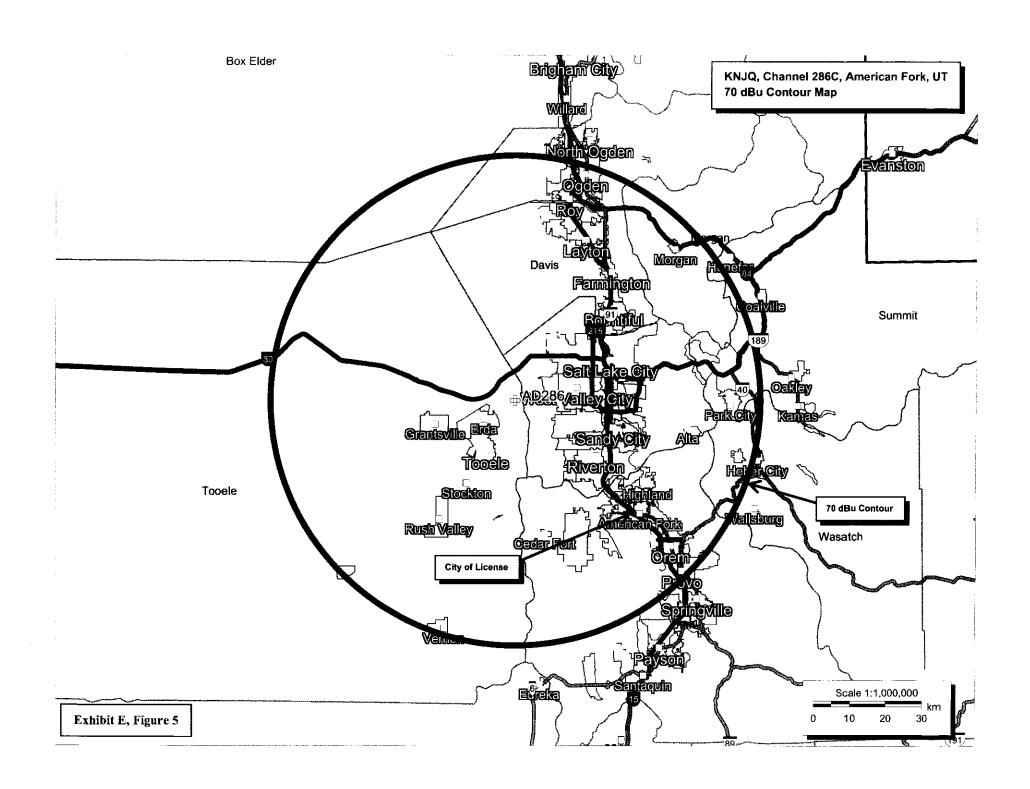
The Joint Parties
MB Docket 05-243, RM-FCC

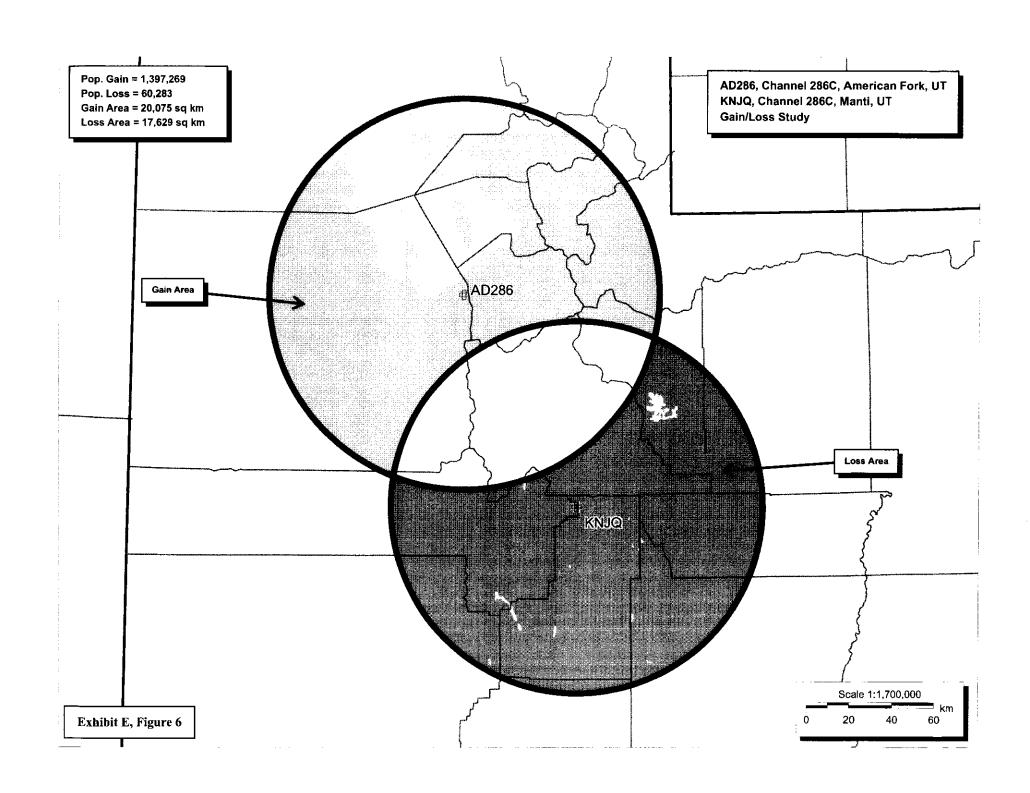
Allocation Study - Ch 286C at American Fork, UT (KNJQ.P)
Deleting Ch 286C Manti, UT and allocation Ch 286C to American Fork
(Using an existing antenna site as reference)

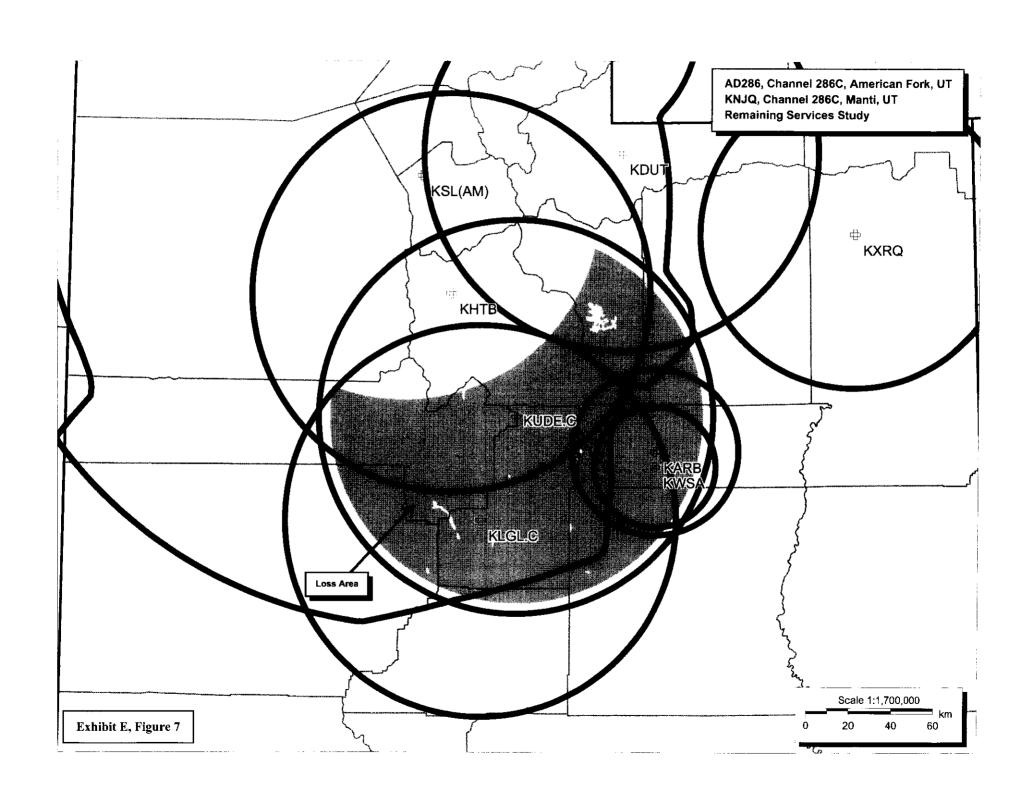
REFER 40 39 3 112 12	84 N 05 W		Cu:	CLASS = rrent Sp	C acing	gs		DISPL DATA SEARCH	AY DATES 09-16-05 09-18-05
Call		nnel	Location		D:	ist	Azi	FCC	Margin
Communi Refer	i <b>ty of</b> cence C th Lati	<b>America</b> oordina tude: 4		UT					
Of no Datab		rn: try fro	<b>Kaysville</b> m Docket MB ( smissal reque	04-427.			343.3	290.0	-220.61
	ote: nsed re		Manti Manti of KNJQ beforestant counter	ore propos	<b>113</b>	3.10 3.10			-176.90 -176.90
Subst			Centerville			0.00	0.0	105.0	-105.00
Modif		rn: n made	Tremonton in previous possibelow.	<b>UT</b> proceeding		95	359.0	188.0	-67.05
KYLZ.C Of No KYLZ	ote:	<b>284C</b> modific		WY	104	1.52	76.6	105.0	-0.48
Of No Modif Use b	ote: fication by KDWY	n propo at; NL	Oakley sed in instar : 40-52-16, t remaining fro	nt counter WL:110-59-	43.	osal f Also		105.0	-0.48
	te: Ltution	of Ch	<b>Thayne</b> 286C1 for Ch 1-01-57		<b>269</b> use			270.0	-0.32

Continued on next page

REFERE	NCE						DISPLAY	DATES
40 39	34 N			CLASS = 0	3		ATAG	09-16-05
112 12	05 W		Curr	ent Spa	acings		SEARCH	09-18-05
			Channel	286 - 10	)5.1 MHz -			
Call	Cha	annel	Location		Dist	Azi	FCC	Margin
	LIC		Diamondville				188.0	
RDEL	DEL	287C2	Diamondville	WY	193.41	46.7	188.0	5.41
of N			. C	1				
Lice	nsea 1	acitity	of KDWY before	modifica	ation			
ADD.P	PRO	285C	Milford	UT	255.16	201.7	241.0	14.16
of N	ote:							
Allo	tment o	of Ch 28	35C proposed in	instant				
			; NL: 38-31-11		3-17-07			
AL284	RSV	284C	Lyman	WY	129.57	78.9	105.0	24.57
					<b></b> -	- <b>-</b>		







In Support of a

# Counterproposal

The Joint Parties
MB Docket 05-243, RM-FCC

Allocation Study - Ch 290C at Centerville, UT (KXRV.P)
Deleting Ch 289C and allocation Ch 290C to Centerville
(Using KXRV existing antenna site as reference)

REFERENCE 40 39 34 N 112 12 05 W	CLAS Current Channel 290	S = C Spa - 10	cings 5.9 MHz		DISPLAY DATA ( SEARCH (	09-16-05 09-18-05
Call Channel			<b></b>			
KXRV LIC 289C Of Note: Licensed facility					241.0	-241.00
KBMG LIC 291C Of Concern:	Evanston	WY	104.52	76.6	241.0	-136.48
	292C at KBMG site s entries of Ch 29				below.	
KOSYFM LIC 293C Of Concern:	Spanish Fork	UT	0.00	0.0	105.0	-105.00
	294C at KOSY site s entries of Ch 29	_		127		
AL290 VAC 290C1 Of Concern:	Thayne	WY	244.92	16.1	270.0	-25.08
Substitution of Ch with a reference s						
KLCYFM LIC 290A Of Concern:	Vernal	UT	222.69	96.2	226.0	-3.31
Substitution of 24	5C2 proposed for 1 ooth substitutions			A		
KBMG.P PRO 292C Of Note:	Evanston	WY	104.52	76.6	105.0	-0.48
	292C for Ch 291C Database also sh			Ch 292C	from MB	04-427
KDWY.P PRO 288C Of Note:	Oakley	UT	104.52	76.6	105.0	-0.48
Allotment of Ch 28 NL: 40-52-16, WL:		at;				
KKMV LIC-Z 291C0	Rupert	ID	219.89	328.4	220.0	-0.11
KTYN.C CP 290C3 Of Note:	Thayne	WY	286.04	17.8	237.0	49.04
	e of proposed down	grade				
	·			<del></del> -		

In Support of a

### Counterproposal

The Joint Parties
MB Docket 05-243, RM-FCC

Allocation Study - Ch 292C at Evanston, WY (KBMG.P)
Deleting Ch 291C and allocation Ch 292C to Evanston
(Using KBMG existing antenna site as reference)

REFERENCE 40 52 16 N 110 59 43 W			Current		cings 63 MHz		DISPLAY DATES DATA 09-16-05 SEARCH 09-18-05		
Call	Chai	nnel			Dist	Azi	FCC	Margin	
KBMG Of No	<b>LIC</b> Concerned fact	<b>291C</b> n: ility o	<b>Evanston</b> f KBMG on Ch 291C b	WY	0.00	0.0			
Of Con Substi This s modifi	cern: tution ubstitu cations	of Ch ution f s that	Spanish Fork  294C proposed at KO acilitates other pr are discussed later entries of Ch 291C	SY 1 opos Se	icensed s ed spectrue KOSY.P	ite. um listed be		-136.48	
	CP		Superior Superior					-44.22 -40.61	
Substi	tution		298C proposed at cl s C1 CP references.		С				
Of Not Substi	e: tution	of Ch	Spanish Fork 294C for Ch 293C at entries of Ch 291C	KOS	Y license	d site.	105.0	-0.48	
	PRO		Centerville Centerville						
· ·		propos	ed of KXRV						
Of Not	e:		Vernal  f KLCY before propo				95.0	34.05	
		_	Shelley				270.0	35.72	
KRAR Of Not Licens	e:		<b>Brigham City</b> f KRAR before propo				105.0	39.92	
KKMV	LIC-Z	291C0	Rupert	ID	271.55	307.7	220.0	51.55	
KYFOFM			Ogden		112.48				

In Support of a

#### Counterproposal

The Joint Parties
MB Docket 05-243, RM-FCC

Allocation Study - Ch 294C at Spanish Fork, UT (KOSY.P) Deleting Ch 293C and allocation Ch 294C to Spanish Fork (Using KOSY existing antenna site as reference)

REFERENCE 40 39 34 N 112 12 05 W	CI Curren	ASS = C at Spacings	1	DISPLAY DATA 0 SEARCH 0	9-16 <b>-</b> 05 9-18-05
Call Channel	Location	Dist	Azi	FCC	Margin
KOSYFM LIC 293C Of No Concern: Licensed facility to Ch 294C. Databa	Spanish Fork of KOSY before pr	UT 0.00 coposed modificat:	<b>0.0</b>	241.0	
MRAR LIC-N 295C Of Concern: Deletion at Bright at Woodruff propos	nm City at allotme	ent of MX 296C		241.0	-116.07
RADD ADD 296C Of Note: Database shows ent			76.6	105.0	-0.48
KBMG LIC 291C KBMG.P PRO 292C Of Note: Licensed and propo		WY 104.52 WY 104.52 at Evanston.	76.6 76.6	105.0 105.0	-0.48 -0.48
KRAR.P PRO 296C Of Note: Proposed allotment NL: 40-56-07, NL:	of Ch 296C (KRAF		72.7	105.0	0.85
AU062 VAC 294C	Hailey	ID 343.67	331.8	290.0	53.67
NEW .C CP 293C1 Of Note: Unexercised CP at	_	www 272.04 substitution of C		209.0	63.04
KMGR LIC 240C	L Delta	UT 105.22			

In Support of a

#### Counterproposal

The Joint Parties

MB Docket 05-243, RM-FCC

Allocation Study - Ch 296C at Woodruff, UT (KRAR.P)
Deleting Ch 295C at Brigham City, UT and allocation Ch 296C to Woodruff (Using proposed allot coordinates as reference)

REFEREN 40 56 0 111 00	CE 7 N 03 W		CLAS Current Channel 296	S = C Spa - 10	cings		DISPLAY DATA ( SEARCH (	DATES 09-16-05 09-18-05
		nnel			Dist	Azi	FCC	Margin
North	nce Co Latit		<b>f</b> es: -31-19		66.5			
<b>RADD</b> Of Not Databa	e:		Henefer  Docket MB 04~427.		7.14	176.3	290.0	-282.86
KRAR Of No Licens	Concer	n:	<b>Brigham City</b> f KRAR before prop				241.0	-101.35
KAOX	LIC CP	297C1	Kemmerer	WY	108.59 108.59	22.3	209.0 188.0	-100.41 -79.41
			1 at Kemmerer and ley, ID proposed f				elow.	
RDEL NEW .C Of Con		296C2 296C2	Huntington Huntington	UT UT	178.6 <b>4</b> 191.97	179.0 183.6	249.0 249.0	-70.36 -57.03
Substi	tution		297C2 proposed with below.	h sit	e change.			
AU062	VAC	295C1	Rangely	CO	208.63	116.2	209.0	-0.37
KOSYFM KOSY.P Of Not	PRO	293C 294C	Spanish Fork Spanish Fork	UT UT	105.85 105.85	253.5 253.5	105.0 105.0	0.85 0.85
	-	propos	ed facilities of K	OSY				
<b>RADD</b> Of Not Databa		298C ry from	American Fork  Docket MB 04-427.	UT	105.85	253.5	105.0	0.85
KENZ.P Of Not	e:	298C	Kaysville		105.85	253.5	105.0	0.85
			of Ch 298C (KENZ) . 12-12-05	at;				
KENZ Of Not		298C	Orem	ייט	107.43	227.6	105.0	2.43
Licens	ed fac	ility b	efore proposed mod	ifica	tion			

Continued on next page

REFERENCE 40 56 07 N 111 00 03 W			Curr	CLASS = C	cings		DISPLAY DATES DATA 09-16-05 SEARCH 09-18-05	
Call	Cha	nnel	Location	290 - 10	Dist	Azi	FCC N	Margin
Of Not Substi	te: Ltution	of Ch	Huntington 297C2 proposed			180.6	188.0	7.12
			11-01-22 Rangely	CO	229.02	113.6	209.0	20.02
of Not	ce:		<b>Idaho Falls</b> f KQEO before				270.0	28.64
Of Not	te: ment of		Shelley C1 (KAOX.P) at 5-34		245.33	342.2	209.0	36.33
KXRK	LIC	242C	Provo	UT	105.85	253.5	48.0	57.85
Of Not Unexe	te: ccised	CP of N	<b>Superior</b> ew.C at Superi bstitution to	or before		70.2	105.0	61.28